

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LIAM LEFEBVRE,)	
)	
Plaintiff,)	
)	
vs.)	No. 1:20-CV-04928
)	
WASHINGTON UNIVERSITY,)	
)	
Defendant,)	

**MOTION OF DEFENDANT WASHINGTON UNIVERSITY TO
DISMISS PLAINTIFF’S COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

Defendant Washington University (the “University”) hereby moves pursuant to Fed.R.Civ.P. 12(b)(2) to dismiss Plaintiff Liam Lefebvre’s Complaint for lack of personal jurisdiction. The allegations in the Complaint fail to establish a prima facie case that the University, a private institution located and incorporated in Missouri, is subject to personal jurisdiction—either general or specific—in this forum.

In support of its Motion, the University files herewith and incorporates herein by reference its Memorandum in Support of Motion to Dismiss.

WHEREFORE, Defendant Washington University respectfully requests that its Motion to Dismiss be granted and that Plaintiff’s Complaint be dismissed in its entirety.

Dated: September 18, 2020

Respectfully submitted,

WASHINGTON UNIVERSITY

By: /s/ Bruce M. Lichtcsien

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on September 18, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ELF system, which will send notification of filing to Plaintiff's counsel.

/s/ Bruce M. Lichtcsien
Bruce M. Lichtcsien, Attorney
for Washington University